## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA,	) .
Plaintiff,	) ) No. 8-CV-50008
VS.	)
YOUNG CONSTRUCTION & PAVING, LLC; KAREN B. YOUNG; GORDON T. YOUNG; JEFFREY D. YOUNG; MONICA L. YOUNG; JOSEPH WELLS; TERRI WELLS; LUKE D. VANDER BLEEK; and JOAN L. VANDER BLEEK,	) ) ) )
Defendants.	)
and	)
JOSEPH WELLS; TERRI WELLS; LUKE D. VANDER BLEEK; and JOAN L. VANDER BLEEK,	) )
Counter-Plaintiffs/Third-Party Plaintiffs,	)
VS.	)
TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA,	) ) )
Counter-Defendants,	) )
and	)
TRISSEL, GRAHAM AND TOOLE, INC., a corporation, DANIEL CURRAN, and ROGER A. COLMARK,	) ) )
Third-Party Defendants.	<i>)</i> )

## **NOTICE OF MOTION**

To: Attorneys of Record Roger A. Colmark

PLEASE TAKE NOTICE that on Wednesday, July 23, 2008, at 1:30 p.m., or as soon thereafter as this Motion may be heard, I shall appear before Honorable Judge Mahoney or

any Judge sitting in his stead, presiding in United States District Court, Northern District of Illinois, Western Division, 211 South Court Street, Rockford, Illinois and then and there present for hearing Motion for Leave to File an Amended Third Party Complaint, a copy of which is attached hereto.

Dated: July 16, 2008.

JOSEPH WELLS; TERRI WELLS; LUKE D. VANDER BLEEK; and JOAN L. VANDER BLEEK

By: RENO & ZAHM LLP

Robert A. Fredrickson

**RENO & ZAHM LLP** 

BY: ROBERT A. FREDRICKSON, #00868469

JACK D. WARD, #3125783

MICHAEL J. SCHIRGER, #6290691

2902 McFarland Road Perry Creek Plaza, Suite 400 Rockford, IL 61107 (815) 987-4050

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served upon the following:

Atty. James M. Allen Hinshaw & Culbertson, LLP 100 Park Avenue P.O. Box 1389 Rockford, IL 61105 Fax No. 815-490-4901

Atty. John E. Sebastian Atty. Albert L. Chollet, III Hinshaw & Culbertson, LLP 222 N. LaSalle St., Suite 300 Chicago, IL 60601 Fax No. 312-704-3001

Mr. Roger Colmark 210 E. 3<sup>rd</sup> Street Sterling, IL 61081 Fax No. 815-626-9268 Atty. Anthony J. Tunney
Hepler, Broom, MacDonald, Hebrank,
True & Noce, LLC
150 N. Wacker Dr., Suite 3100
Chicago, IL 60606
Fax No. 312-230-9201

Atty. Steven Balsley Barrick, Switzer, Long, Balsley & Van Evera 6833 Stalter Drive Rockford, IL 61108 Fax No. 815-962-0687

by depositing the same in the United States Mails, postage prepaid, addressed as above, at Rockford, Illinois on July 16, 2008.

Subscribed and sworn to before me on July 16, 2008.

**,** ',

"OFFICIAL SEAL"
JANE BRAWNER

Notary Public, State of Illinois My Commission Expires 09/02/09

ROBERT A. FREDRICKSON, #412 Reno & Zahm LLP 2902 McFarland Road, Suite 400 Rockford, IL 61107 815/987-4050